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*Attorneys for Claimants First 100, LLC,
1st One Hundred Holdings, LLC, and
Battle Born Investments Company, LLC*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Approximately 69,370 Bitcoin (BTC),
Bitcoin Gold (BTG), Bitcoin SV (BSV), and
Bitcoin Cash (BCH) seized from
1HQ3Go3ggs8pFnXuHVHRytPCq5fGG8Hb
hx,

Defendant.

Case No. 20-7811-RS

**CLAIMANTS BATTLE BORN
INVESTMENTS COMPANY, LLC, FIRST
100, LLC AND 1ST ONE HUNDRED
HOLDINGS, LLC'S JOINT OPPOSITION
TO MOTION FOR DIRECT ACCESS
AND INTERVENTION BY NOBUAKI
KOBAYASHI**

Date: June 10, 2021
Courtroom: 3
Floor: 17th
Judge: Hon. Richard Seeborg

Case Filed: November 5, 2020
FAC Filed: November 20, 2020
Trial Date: TBD

1 Claimants Battle Born Investments Company, LLC, First 100, LLC, and 1st One
2 Hundred Holdings, LLC (“Claimants”) by and through their undersigned counsel, hereby file
3 their joint opposition to Nobuaki Kobayashi’s Motion for Direct Access and Intervention as
4 follows:

5 Claimants submit their joint opposition to Mr. Kobayashi’s Motion to the extent that he
6 seeks any determination ownership of the in rem property at issue in this action or be influenced
7 by the findings of any other court, given that this is a forfeiture proceeding brought by the United
8 States government. The in rem property is subject to the jurisdiction of the U.S. Federal Courts,
9 and any determination as to who has superior right and title to the same must be made with
10 reference to controlling U.S. law in the U.S. Courts, not a foreign jurisdiction. Additionally
11 Claimants join the United States’ Opposition.

12 Dated: May 10, 2021

FOX ROTHSCHILD LLP

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14 By: /s/ Jaemin Chang

15 JAEMIN CHANG
16 JEFF NICHOLAS (Pro Hac Vice To Be Filed)
17 Claimants First 100, LLC,
18 1st One Hundred Holdings, LLC, and
19 Battle Born Investments Company, LLC
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